

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO: _____
v.	:	DATE FILED: _____
ARTUR GRIGORYAN	:	VIOLATIONS: 18 U.S.C. § 1028A
ARTUR HARUTYUNYAN	:	(aggravated identity theft - 1 count)
	:	18 U.S.C. § 1349 (conspiracy to commit
	:	bank fraud – 1 count)
	:	18 U.S.C. § 1344 (bank fraud – 3 counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times relevant to this information, Citizens Bank, PNC Bank and Wachovia Bank were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.
2. From in or around September 2006, through on or about July 18, 2007, in the Eastern District of Pennsylvania and elsewhere, defendants

ARTUR GRIGORYAN and
ARTUR HARUTYUNYAN

conspired and agreed, together and with A.S., and others unknown to the United States Attorney, to knowingly and with intent to defraud, execute and attempt to execute a scheme to defraud Citizens Bank, PNC Bank and Wachovia Bank, in violation of Title 18, United States Code, Section 1344.

MANNER AND MEANS

3. It was part of the scheme that defendants ARTUR GRIGORYAN and ARTUR HARUTYUNYAN, working with A.S., a conspirator known to the United States Attorney, installed a skimming device at a drug store cashier station and thereby captured victim account numbers. The defendants then used the stolen numbers to steal approximately \$351,050 from the victim accounts.

OVERT ACTS

4. On or about September 11, 2006, defendants ARTUR GRIGORYAN and ARTUR HARUTYUNYAN, directed A.S., to obtain employment at a Rite Aid store located in Wayne, Pennsylvania (“the Rite Aid store”), for the purpose of furthering a conspiracy to defraud financial institutions.

5. In or about January 2007, defendants ARTUR GRIGORYAN and ARTUR HARUTYUNYAN traveled to the Rite Aid store. There, with the assistance of A.S., defendant GRIGORYAN placed a skimming device inside the Verifone debit/credit card pad which was attached to a cash register inside the store. The pad with the skimming device captured the debit card numbers and PINs of the Rite Aid customers who utilized their bank debit cards from in or around January 2007 through in or around April 2007, to make purchases at that register.

6. On or about various dates in January and February, 2007, defendants ARTUR GRIGORYAN and ARTUR HARUTYUNYAN again traveled to the same Rite Aid store in Wayne, Pennsylvania. When a store clerk other than A.S. was present, defendant HARUTYUNYAN distracted the store clerk while defendant GRIGORYAN downloaded the information captured by the skimming device that had been placed within the Verifone pad.

Defendant GRIGORYAN then used the information to manufacture counterfeit debit cards. The downloaded information belonged to customers at the financial institutions named in paragraph 1 above.

7. In or about April 2007, defendants ARTUR GRIGORYAN and ARTUR HARUTYUNYAN again traveled to the same Rite Aid store in Wayne, Pennsylvania. Defendant HARUTYUNYAN distracted the store clerk while defendant GRIGORYAN retrieved the skimming device that had been placed within the Verifone pad. Defendant GRIGORYAN then downloaded the information captured by the skimming device, and used the information to manufacture counterfeit debit cards. The downloaded information belonged to customers at the financial institutions named in paragraph 1 above.

8. Between on or about June 10, 2007, and on or about July 18, 2007, defendants ARTUR GRIGORYAN and ARTUR HARUTYUNYAN used the counterfeit debit cards to make fraudulent ATM withdrawals totaling approximately \$351,050.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

- _____1. Paragraphs 1 and 3 through 8 of Count One are incorporated here.
2. In or about January 2007 to July 18, 2007, in Wayne, in the Eastern District of Pennsylvania, and elsewhere, defendants

ARTUR GRIGORYAN and ARTUR HARUTYUNYAN

knowingly executed, and attempted to execute, a scheme to defraud Citizens Bank, and to obtain approximately \$111,000 in monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendants ARTUR GRIGORYAN and ARTUR HARUTYUNYAN withdrew approximately \$111,000 using stolen account numbers.

In violation of Title 18, United States Code, Section 1344.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

- _____ 1. Paragraphs 1 and 3 through 8 of Count One are incorporated here.
2. In or about January 2007 to July 18, 2007, in Wayne, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ARTUR GRIGORYAN and
ARTUR HARUTYUNYAN**

knowingly executed, and attempted to execute, a scheme to defraud PNC Bank, and to obtain approximately \$144,575 in monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendants ARTUR GRIGORYAN and ARTUR HARUTYUNYAN withdrew approximately \$144, 575 using stolen account numbers.

In violation of Title 18, United States Code, Section 1344.

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

- _____ 1. Paragraphs 1 and 3 through 8 of Count One are incorporated here.
2. In or around January 2007 to July 18, 2007, in Wayne, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ARTUR GRIGORYAN and
ARTUR HARUTYUNYAN**

knowingly executed, and attempted to execute, a scheme to defraud Wachovia Bank, and to obtain approximately \$95,475 in monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendants ARTUR GRIGORYAN and ARTUR HARUTYUNYAN withdrew approximately \$95,475 using stolen account numbers.

In violation of Title 18, United States Code, Section 1344.

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From in or around January 2007, through on or about July 18, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

ARTUR GRIGORYAN

knowingly and without lawful authority, possessed and used the means of identification of more than 234 persons, that is, the account numbers and personal identification number codes, during and in relation to bank fraud.

In violation of Title 18, United States Code, Section 1028A.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344 and 1349 charged in this information, defendants

**ARTUR GRIGORYAN and
ARTUR HARUTYUNYAN**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds obtained directly or indirectly as a result of such violations, including but not limited to the sum of \$351,050 in United States currency and a 2001 Jeep, Grand Cherokee Laredo model, VIN # 1J4GW48S21C519510, Pennsylvania registration GTX9687.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any property of

either of the defendants up to the value of said property listed above as being subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(B).

LAURIE MAGID
Acting United States Attorney